

# EXHIBIT B

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

## BRANDON CALLIER,

**Plaintiff,**

V.

**POWUR, PBC INC dba POWUR, a Delaware Corporation**

## Defendant.

EP-23-cv-00302-KC

**SECOND DECLARATION OF BRANDON CALLIER PURSUANT TO 28 U.S.C. § 1746  
IN SUPPORT OF HIS MOTION FOR SUMMARY JUDGMENT**

I, Brandon Callier, make the following declaration subject to the penalties of perjury:

1. My name is Brandon Callier. I am the Plaintiff, Pro Se, in the above-numbered and styled lawsuit. I am fully competent to make this declaration, have personal knowledge of the following facts, and could testify to them if called upon to do so.
2. Attached as Exhibit B-1 to this declaration is a true and correct copy of excerpts of the phone records produced by Brandon Callier to POWUR PBC, INC (“POWUR”) during Discovery.
3. Attached as Exhibit B-2 to this declaration is a true and correct copy of the Admissions and Interrogatories responses submitted to me by Defendant POWUR in this case.
4. Attached as Exhibit B-3 are screenshots of web pages I submitted to Defendant POWUR as part of Requests for Production.
5. Attached as Exhibit B-4 to this declaration is a true and correct copy of POWUR Agent solicitation emails I submitted to Defendant POWUR as part of Requests for Production.

6. The following POWUR Agents are the owners and regular users of these phone numbers used to contact me to solicit me for solar panels on behalf of Defendant POWUR.

Robert Hall – 732-575-2007  
Jerrell Mixon – 480-431-7017  
Genesis Segovia – 210-781-1349  
Garrett Allred – 208-602-9679  
Derrick Grant – 856-505-9559  
Edward Zajac – 631-680-1135  
Bobby Smith – 410-977-8777  
Eric Garcia – 210-952-8664  
Jamie Thompson – 530-613-8580  
Christopher Young – 513-888-0213  
Marc Ross – 937-418-7976

7. Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 17, 2024



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Brandon Callier